

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

FREDRICK L. REID Debtor.)))	Case No. 16-34245 Chapter 13 Suzanne Wade, Ch 13 Trustee
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MOTION TO CONTINUE AUTOMATIC STAY

COMES NOW Fredrick L. Reid, by counsel, Nupa Agarwal, pursuant to 11 U.S.C. § 362(c)(3)(B) , and requests that the Court grant an extension of the automatic stay as to all creditors, as to the Debtor and the debtor's property, and as to the property of the estate for the duration of this Chapter 13 proceeding. In support of this Motion the Debtor states as follows:

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §§1334 and 157 in that this action arises in and relates to this bankruptcy case of the Debtor, filed in this Court on March 16, 2017.
2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A), (B),(K), and (O).
3. Venue is proper pursuant to 28 U.S.C. §1409.
4. On March 16, 2017, the Debtor filed in this Honorable Court a petition for Relief under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§ 1301 et seq. (the "instant case"). Suzanne Wade was appointed to serve as Chapter 13 Trustee in this case.
5. The Debtor has filed previous bankruptcy cases: The most recently filed previous case was a Chapter 13 filed on August 26, 2016 and dismissed on November 14, 2016. The prior case was dismissed because the Debtor failed to provide information for Objection to Confirmation. The debtor now understands he needs to provide the information the trustee request within a timely matter.
6. The instant case was filed on March 16, 2017 which is within one year of the dismissal date of the prior bankruptcy thus triggering the provision of 11 U.S.C. 362(c)(3).
7. The Debtor's prior case was dismissed for not providing all the documents the Trustee requested including previous year's tax returns. The debtor did not realize he only had a certain amount of time to get those documents to his attorney. Debtor understands the importance of this Chapter 13 and will use all his "financial means" to make this case work. His current attorney has discussed with him the importance of reading all documents and taking

responsibility for his case. He has now filed all tax returns and his attorney has copies of the tax transcripts.

8. The automatic stay will expire on April 16, 2017 which is 30 days after this case was filed.

9. The Debtor filed this case in good faith.

WHEREFORE, for the foregoing reasons, the Debtor respectfully requests that this Court enter an Order extending the automatic stay under 11 U.S.C. § 362 as to all creditors, as to the debtor and the debtor's property, and as to the property of the estate for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362 (c) (1) or (c) (2), or a motion for relief is granted under § 362(d) and for such other and further relief as the Court shall be deemed appropriate.

Respectfully submitted:

Fredrick L. Reid

By: /s/ Nupa Agarwal

Counsel for Debtor

VA. State Bar No. 42545

P.O. Box 17275

Richmond, Virginia 23226

PROOF OF SERVICE

I certify that I have this 22nd Day of March 2017 transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor, Fredrick L. Reid, 300 West 27th Street, Richmond, VA 23225; Chapter 13 Trustee, the United States trustee and to all necessary parties, on the mailing matrix maintained by the clerk of court, a copy of which is attached.

/s/Nupa Agarwal

Nupa Agarwal

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

FREDRICK L. REID
Debtor.

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Case No. 16-34245
Chapter 13

NOTICE OF MOTION AND HEARING

The above-named Debtor having filed papers with the court to Extend the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.

Pursuant to Local Bankruptcy Rule 6004-4, unless a written response to this motion objecting to the relief requested is filed with the Clerk of the Court and served on the moving party **within fourteen (14) days**, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.

You must also attend a hearing on the Motion to Extend the Automatic Stay, scheduled to be held on **APRIL 12, 2017, at 12PM**, in Judge Huennekens Courtroom at the U.S. Bankruptcy Court, 701 E. Broad Street, Courtroom 5000, Richmond, VA, 23219.

You must also mail a copy of your response to Nupa Agarwal, Esquire, Counsel for Debtor, P.O. Box 17275, Richmond, VA 23226.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that motion.

Date: March 22, 2017

/s/ Nupa Agarwal
Nupa Agarwal, Esq.
Va. State Bar No. 42545
P.O. Box 17275
Richmond, Virginia 23226
(804) 716-0493

PROOF OF SERVICE

I certify that I have this 22nd Day of March 2017 transmitted a true copy of the foregoing application electronically through the Court's CM/ECF system or by mail to the Debtor, Fredrick L. Reid, 300 West 27th Street, Richmond, VA 23225; Chapter 13 Trustee, the United States trustee and to all necessary parties, on the mailing matrix maintained by the clerk of court, a copy of which is attached.

/s/Nupa Agarwal
Nupa Agarwal

Department of Treasury-IRS
IRS
PO Box 7346
Philadelphia, PA 19101

Capital One
Po Box 30285
Salt Lake City, UT 84130

Capital One Bank N.A.
Bankruptcy Dept.
PO Box 5155
Norcross, GA 30091

Chesterfield County Gen Dist.
9500 Courthouse Road
P.O. Box 144
Chesterfield, VA 23832

Client Services Inc.
3451 Harry Truman Blvd
Saint Charles, MO 63301

Commonwealth of VA-Tax
PO Box 2156
Richmond, VA 23218

Credit Collection Services
725 Canton Street
Norwood, MA 02062

Credit Collections services
PO Box 55126
Boston, MA 02205-5126

Enhanced Recovery Corp
8014 Bayberry Rd
Jacksonville, FL 32256

First Premier Bank
601 S Minneaplois Ave
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Firstsource Advantage , LLC
PO Box 628
Buffalo, NY 14240-0628

Internal Revenue Service
Insolvency Unit
Post Office Box 21126
Philadelphia, PA 19114

IRS Centralized Insolvency Ope
PO BOx 7346
Philadelphia, PA 19101-7346

Mariner Finance
8211 Town Center Drive
Suite 106
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Merrick Bank
Po Box 660702
Dallas, TX 75266-0702

Nationstar Mortgage LLC
Attn: Bankruptcy
Po Box 619096
Dallas, TX 75261-9741

T-Mobile
PO Box 742596
Cincinnati, OH 45274

Wells Fargo
Attn: Bankruptcy
1 Home Campus X2303-01a
Des Moines, IA 50328

Wells Fargo Bank Nv Na
Po Box 5058
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